EXHIBIT 57

Case 9:200 cli-20127-203580 thent 2005 in entitle 112/20/27 ile chase 2/20127 17 gapage 153 10389

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1	IN THE UNITED STATES DISTRICT COURT			
2 3	FOR THE NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION			
3	MIGUAEL GLOUD			
4	MICHAEL CLOUD, :			
4	Plaintiff, :			
5				
5				
6	vs. : 3:20-CV-01277-E			
0	THE BERT BELL/PETE ROZELLE :			
7	NFL PLAYER RETIREMENT PLAN,:			
/	NEL PLAIER RETTREMENT PLAN,:			
8	Defendant. :			
0	Defendant			
9				
10	INDIVIDUAL AND 20 (b) (c) DEDOCTETON OF			
11	INDIVIDUAL AND 30(b)(6) DEPOSITION OF HESSMAN VINCENT			
12	DATE: August 10, 2021			
13	TIME: 10:06 a.m. to 8:34 p.m.			
14	LOCATION: Groom Law Group			
	1701 Pennsylvania Avenue			
15	Suite 1200			
	Washington, D.C. 20006			
16				
17	REPORTED BY: Felicia A. Newland, CSR			
18	,			
19				
20				
	Veritext Legal Solutions			
21	1250 Eye Street, N.W., Suite 350			
	Washington, D.C. 20005			
22				
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1	Q And when you say "the parties," do	1	the same page with how it's worded, do you all call
2	you mean the NFL Management Council and the NFLPA	? 2	them neutral physician?
3	A That's correct. They agree on	3	A Yes, that's correct.
4	neutral physicians.	4	Q So if I say "the neutrals" or "the
5	Q Who submits neutral physicians to the	5	neutral physicians," those will be the people that
6	NFL Management Council and the NFLPA for	6	you understand to be the Plan doctors. Is that
7	consideration?	7	correct?
8	A That primarily comes through me.	8	A Yes. I will understand that, yes.
9	Q Okay. And how do you go out and find	9	Q How is the Plan funded?
10	Plan doctors?	10	A By the Management Council I'm
11	A We have a group of consultants of	11	sorry, the league owners.
12	various specialties. So depending on what our	12	Q And so correct me if I'm wrong, and
13	needs are for a certain specialist in a certain	13	tell me point out if I've said anything
14	area, for example city, state, we will refer to	14	incorrectly just so I can put this in a bottle for
15	them to see if there is a person that they may know	15	a second.
16	that could participate in our plans.	16	The NFL Management Council and the
17	Q Who are those consultants?	17	NFLPA negotiate and they come to a CBA and
18	A Let me write this down so I make sure	18	ultimately there's an agreement on the distribution
19	I won't skip anybody at the same time. We have our	19	of revenue, correct?
20	medical director, orthopedist Dr. Aakash Shah. We	20	A Correct.
21	have another consultant orthopedist, Dr. Harlan	21	Q And out of that distribution of
22	Selesnick. We have our consulting	22	revenue, where does the disability Plan benefits
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1	neuropsychologist, Dr. Bill Garmoe. We have our	1	money come from?
2	consulting neuropsychologist, Dr. Stephen	2	So I see you looking through the
3	Macciochin. We have our consulting psychiatrist,	3	document that's been marked Exhibit 20. Do you not
4	Dr. Steve Epstein. We have our consulting	4	know that answer without consulting your binder?
5	neuropsychologist and psychiatrist Dr. Silvana	5	A I understand that contributions are
6	Riggio. That's the group.	6	made through the employer to The Plan.
7	Q All right. As I heard what you said	7	Q Okay. So if I understand you
8	the consultants were referenced were Dr. Shah, Dr.	8	correctly, the employer would be
9	Selesnick, Dr. Garmoe sorry, the consultant are	9	A NFL owners.
10	Dr. Shah, Dr. Selesnick, Dr. Garmoe,	10	Q the league through the owners,
11	Dr. Macciochin, Dr. Epstein, and Dr. Riggio?	11	correct?
12	A Riggio, R-I-G-G-I-O.	12	A Correct.
13	Q Riggio.	13	Q Is there an annual amount that's
14	A Yes.	14	distributed from the owners to The Plan?
15	Q Was anybody else correct?	15	A I'm not sure of the annual amount.
16	A Yes.	16	Q I'm saying, is there an annual
17	Q Or I marginally said it closely?	17	amount? Is there a set amount?
18	A Yes, it was pretty close.	18	A I do not know the answer.
19	Q Okay. Who pays the neutral doctors?	19	Q So you know it's funded by the
20	A It comes out of the Plan, disability	20	owners, you just don't know if it's a set amount or
21	Plan.	21	if there's a determination of how that amount comes
22	Q And just so we're clear and we're on	22	in. Is that correct?
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